

SAFEGUARDING IN PRACTICE:

**'WHAT WORKS' TO SUPPORT
NON-GOVERNMENTAL
ORGANISATIONS IN
TANZANIA TO RESPOND
TO CHILD ABUSE.**

Summary of Research Findings

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Since 2002, there has been a proliferation of safeguarding standards designed to ensure that non-governmental organisations (NGOs) working within the international development sector 'do no harm' and that allegations of abuse receive a swift and robust response. Although these standards have been adopted by leading NGOs and incorporated into the funding requirements of international donors, there is still very little evidence to support their effectiveness and there have been repeated calls for more robust evidence about 'what works'.

Between 2016 and 2020, I carried out doctoral research to critically examine the role of safeguarding standards in improving the reporting and response to child abuse by NGOs. Rather than simply considering what safeguarding measures are implemented, my aim was to understand how these measures produce change and why this may vary between contexts. Although this study focused on NGOs in Tanzania, data was collected from professionals working across East Africa and the findings have implications for the way international agencies approach safeguarding across the region.

My analysis of international standards and donor requirements identified three key processes which appear designed to ensure that ensure that NGO workers are equipped to recognise, report and respond to abuse. Firstly, there are measures to educate and inform NGO workers through the provision of guidance and training. Secondly, policies and procedures help to establish clear expectations and finally, oversight from managers, executive boards and donors is designed to create accountability and ensure compliance with the agreed safeguards.

While each of these has some value, my findings suggest that a change in approach is needed:

- Rather than simply educating and informing NGOs about safeguarding, learning opportunities must have practical resonance so that workers understand and feel confident to apply the measures within their day-to-day practice.
- Although clear expectations are important, personal relationships play a significant role and clarity needs to be coupled with confidence through collaboration with others, both within and outside the NGO.
- While accountability is important but in order to have credibility and authority, those in positions of power need to demonstrate mutual accountability by leading by example and providing the support and resources NGO workers need to respond to abuse.

These findings have important implications for the way policy makers, donors and international NGOs approach safeguarding with NGOs in Tanzania:

Finding 1: 'Start where people are' by creating learning opportunities that have practical resonance.

- NGOs should move away from documenting 'best practice' as defined by international experts in favour of interactive learning opportunities that are grounded in practice.
- Training is most effective when it encourages discussion, resonates with workers' own experiences and is delivered by individuals with a deep understanding of the operating context.
- Learning about abuse and safeguarding is on-going and practice-based learning should be recognised and valued as legitimate strategy to improve workers' knowledge and skills.
- Peer-to-peer learning between organisations can be useful to identify and overcome common challenges but this requires investment in order to be sustainable.
- Individual values and beliefs can have a significant impact on practice and must, therefore, be considered during the recruitment, training and supervision of NGO workers.

Finding 2: 'The system is relational' and implementation depends on trust and collaboration.

- NGO workers need to contribute to the creation of procedures to ensure they are realistic and effective. This should include explicit discussions around power, trust and relationships.
- It is important to offer alternative reporting channels for abuse that take into account intersecting identities of gender, race and religion.
- Safeguarding Focal Points play an important role but NGOs require funding to ensure these individuals have the capacity, knowledge and skills needed to fulfil their responsibilities.

- Case discussions between key members of staff should be included any response procedure, rather than relying on one individual to determine the most appropriate response.
- More needs to be done to strengthen the relationships between agencies rather than simply mapping services in the local area or documenting referral pathways.
- Safeguarding measures need to recognise the importance of ongoing engagement and support families as part of the response, and this aspect of the work needs to be adequately funded.
- Safeguarding measures can be strengthened by including many of the positive principles and practices that already exist within case management guidelines.

receive many reports of abuse in the community which they cannot simply refer on to other agencies. Funding for safeguarding must reflect this.

- NGOs' ability to respond effectively to cases is often limited by weaknesses in the child protection system. Donors can have a positive impact by investing in child protection system strengthening.

Finding 3: 'Accountability is mutual' and requires senior leaders and donors to lead by example.

- Managers should provide proactive support to staff, both in response to concerns and more broadly through supervision and ongoing engagement.
- There is a need to provide specific safeguarding training for managers to help them fulfil their role in fostering a culture of openness and supporting frontline staff.
- Promoting accountability for safeguarding at Board level may be unrealistic in many national NGOs and will require a significant change in governance structures before it can be effective.
- It is important for donors to implement safeguarding within their own organisations before imposing expectations on others.
- Donors need to make proactive efforts to understand the reality of safeguarding in the countries where they fund, either through employing staff in the region or visiting programmes regularly.
- The threat of funding being withdrawn is counterproductive. Instead, donors should engage in constructive dialogue with NGO to understand the multiple risks they are trying to manage.
- Donors should allow NGOs to include a budget line for safeguarding in order that they can cover the cost of implementing the required safeguarding measures.
- In addition, donors need to recognise that NGOs

Since 2002, there has been proliferation of safeguarding standards designed to ensure that NGOs within the international development sector 'do no harm' and that allegations of abuse receive a swift and robust response. In 2017, I published an article highlighting the concerns of NGOs I had worked with in East Africa, who warned that the reporting and responding procedures recommended by these standards were unlikely to be effective in their context. Less than a year later, media reports uncovered the failure of leading aid agencies to respond to safeguarding concerns, despite having developed the recommended policies and procedures. The resulting inquiry by the UK's International Development Committee (IDC) acknowledged the efforts NGOs had made to implement safeguarding measures but found that they had failed to produce tangible results.

Since this time, there have been repeated calls for more robust evidence to inform efforts to improve the reporting and response to abuse. To date, the majority of research conducted into the reporting and response to safeguarding concerns has focused on the experiences of community members living in refugee settings. This study provides new insights by exploring the experiences NGO workers when responding to child abuse in a non-refugee setting in Tanzania. The aim was not to prove or disprove the effectiveness of international safeguarding standards, but to improve our understanding of how local conditions promote or constrain their effectiveness. In this research briefing, I share some of the key insights that emerged from my study and offer recommendations to help national and international NGOs, policymakers and donors strengthen their approach.

Inevitably, it is impossible to share all of the rich and nuanced insights shared by participants in such a limited space. If you are interested in finding out more, you can find my full thesis on the University of Bedfordshire repository.

Walker-Simpson, K. (2017) *The Practical Sense of Protection: A Discussion Paper on the Reporting of Abuse in Africa and whether International Standards Actually Help Keep Children Safe*, *Child Abuse Review*, 26, pp.252-262

International Development Committee (2018) *Sexual exploitation and abuse in the aid sector: Eighth Report of Session 2017-19*, London: International Development Committee. Available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/840.pdf>

Defining 'safeguarding'

Although the term 'safeguarding' is widely used across the international development sector, there are significant inconsistencies in the way it is defined. The definition applied in this study was strongly influenced by my experiences working with NGOs in East Africa.

- **Prevention or response?**
International safeguarding standards generally encompass measures to both prevent and respond to abuse. While most NGOs I worked with appeared comfortable with the preventative measures, they were less confident about the approach to response and some even feared these measures might expose children further harm. Consequently, this study focuses on the reporting and response to abuse while acknowledging the importance of prevention.
- **Abuse by aid workers or abuse in the community?**
Within international development, safeguarding measures are primarily designed to combat abuse by aid workers. While important, this only accounts for a small proportion of all violence against children. Furthermore, evidence suggests that NGOs who implement safeguarding measures are likely to receive an increase in reports about abuse in the community, while reports of abuse by aid workers remain low. Consequently, this study includes the response to abuse in the community as this is critical to the overall goal of safeguarding children.
- **Harm or abuse?**
Safeguarding standards primarily focus on the prevention and response to physical, emotional, and sexual abuse, neglect, and exploitation. While this is consistent with the international, regional and Tanzanian law, these definitions risk ignoring other forms of harm that arise when intervening to address abuse, such as social stigma, violent backlash or severe financial hardship. While my study focuses on the response to abuse and exploitation, it also takes into account of other forms of unintended harm which NGOs may need to consider.

- **Children or adults?**

While this study focuses exclusively on the response to abuse of children under the age of 18, I do consider safeguarding requirements that are not child specific. This is important for two reasons. Firstly, NGOs working with children may be expected to comply with standards which are not focused exclusively on children. Secondly, the lack of empirical evidence means it is difficult to predict which standards are likely to be the most effective. As such, it is important to remain open to the possibility that different standards may contain guidance which could be helpful in strengthening the response to child abuse.

SECTION 2: METHODOLOGY

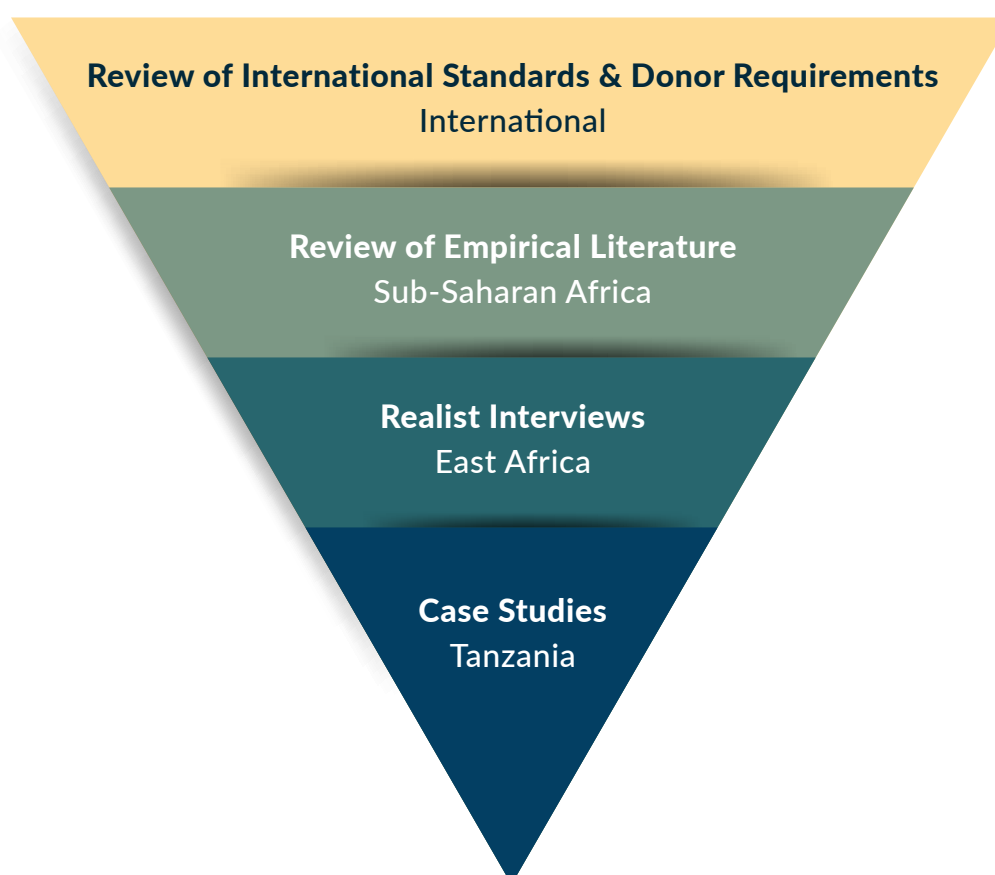
In order to understand 'what works' for NGOs in Tanzania, my study used 'critical realism' as the analytical framework. Within this approach, the procedures and processes recommended by international standards are viewed as 'resources' that can help NGOs respond to abuse. In order to achieve positive results, these 'resources' must influence the 'reasoning' of NGO workers. Their ability to do so, however, will depend on the specific conditions in the country of operation as well as the institutional and inter-personal context within the NGO. In adopting this approach, my aim was to move beyond what safeguarding measures are implemented to understanding how these measures produce change and why this may vary between contexts.

Data collection for this study took place between March 2016 and November 2019 and was conducted in four distinct stages. I started by reviewing international standards, donor requirements, implementation guides, and policy commitments to understand how safeguarding measures aim to improve the reporting and response to abuse (Appendix A). Next, I examined research from sub-Saharan Africa to see whether there was any empirical evidence to support the effectiveness of the recommended measures. (Appendix B).

Once the desk research was complete, I then interviewed seven representatives from standard-setting bodies to test my understand how safeguarding measures aim to improve the reporting and response to abuse. I also interviewed representatives from 10 international NGOs who work with partners in East Africa, to gain insight into the application and effectiveness of measures across diverse organisational and geographical contexts.

Finally, I spent six weeks in Tanzania conducting case study research with a large global NGO, a medium-sized local NGO, and a small community-based organisation (CBO), all in one urban location. I made field visits and conducted 22 interviews with NGO workers. I also met with statutory and community stakeholders to better understand the relationship between the NGOs and the wider child protection system.

After the interviews with international respondents and the case studies in Tanzania, I held focus groups with the research participants to share initial findings and further refine my understanding of 'what works'.



SECTION 3: KEY FINDINGS

My review of international standards and donor requirements identified three key processes which appear designed to ensure that NGO workers are equipped to recognise, report and respond to abuse. Firstly, there are measures to educate and inform NGO workers through the provision of guidance and training. Secondly, policies and procedures help to establish clear expectations and finally, oversight from managers, executive boards and donors creates accountability to ensure compliance with the agreed safeguards.

Evidence from my study suggest that while each of these has some value, a change in approach is needed.

- Rather than simply educating and informing NGOs about safeguarding, learning opportunities must have practical resonance so that workers understand and feel confident to apply the measures within their day-to-day practice.
- Although clear expectations are important, personal relationships play a significant role and clarity needs to be coupled with confidence through collaboration with others, both within and outside the NGO.
- While accountability is important but in order to have credibility and authority, those in positions of power need to demonstrate mutual accountability by leading by example and providing the support and resources NGO workers need to respond to abuse.

In the following sections, I will explore the structures and processes recommended by policymakers and donors, outlining areas where they have the potential to achieve positive change, as well as some of the challenges NGO workers face when trying to implement these measures. Based on my findings, I suggest changes to the current approach and explain how these could improve the effectiveness of safeguarding measures.

FINDING 1: 'START WHERE PEOPLE ARE' BY CREATING LEARNING OPPORTUNITIES THAT HAVE PRACTICAL RESONANCE

International safeguarding standards repeatedly highlight workers' lack of knowledge and skills as a potential barrier to the effective reporting of and response to abuse. The guidance warns that workers may have little or no understanding of what is meant by child abuse, may be unsure about when and how to report safeguarding concerns, and that, once reported, NGOs may not know what action to take. In order to address this, international agencies have developed a broad array of guidance outlining the essential components of effective safeguarding and donors consistently require NGOs to train their workers on how to identify, report and respond to abuse.

Although there was some evidence to support the value of guidance and training, my study identified a significant disconnect between the best practice set out in guidance and the lived reality of NGO workers. Although a conceptual understanding of safeguarding provide a helpful foundation, there is a need to move beyond a conceptual understanding of safeguarding in favour of promoting learning opportunities that are grounded in actual practice and resonate with workers at both a personal and practical level.

“It's created more confusion...Is there a word for 'safeguarding' in Swahili? No, it's literally 'protection'. How can I get a person to conceptualise what safeguarding is if I don't have the linguistic means to communicate that?”
International NGO

“Coming down with “This is what the international community has agreed on”. We weren't there, you were. Yes, a lot of people were educated, but you don't deal with the grassroots level and imposing on us is not realistic and fair.”
Tanzanian NGO

Best Practice Guidance

Over the last 20 years, there has been significant investment in creating and disseminating guidance on safeguarding. Yet I uncovered significant concerns about the effectiveness and impact of this guidance:

- The term 'safeguarding' is poorly understood and has created confusion rather than clarity.
- The sheer volume of information and the use of technical language makes the guidance inaccessible to many NGOs.
- Generic guidance developed outside Tanzania may lack relevance and can generate resentment if NGOs feel compelled to meet expectations that do not make sense in their context.
- Embedding safeguarding tends to be more successful when it reflects the specific structure, mission and values of each organisation. This may be undermined if organisations are compelled to adhere to an externally defined approach.

“We had redone the guidelines and it was the UN and large INGOs going 'Here is the easy version'. But it was 2 kilos.... Are you kidding me?' We are part of the problem, creating guidelines of 400 pages. It defies belief.”
International NGO

The limitations inherent in current guidance was clearly evident in this study. Very few international NGOs actually shared safeguarding toolkits and guidance with their local partners and none of the Tanzanian NGOs mentioned using these to improve their practice. Instead, international NGOs tended to act as mediators of best practice by running workshops or discussions with their partners to contextualise the measures and decide how they could best be applied within each organisation. Although all three Tanzanian NGOs valued this type of support, this does risk creating a dependence on international agencies as mediators of best practice knowledge.

Training

One of the most consistent recommendations across all international standards and donor requirements is that NGOs offer their staff and volunteers training on safeguarding, including guidance on how to identify and respond to abuse. While there was consensus around the importance of training, there was also caution about the effectiveness of training to actually produce change. I found that:

- Training is most valuable when it encourages discussion that allows workers to unpick their understanding of abuse and their responsibilities to respond to it. Too often, however, trainers rely on generic presentations that simply impart information rather than encouraging discussion.
- The use of international 'experts' to facilitate training can create resistance, particularly if they are perceived to be imposing external values or advocating an approach that is unrealistic within the local context.
- Training on theories and concepts provides a useful foundation but this information is easily forgotten if it is not contextualised and doesn't resonate with the worker's own experience.
- Cultural norms around what constitutes abuse represent one of the main barriers to its identification and response. These beliefs can be deeply embedded and it is unrealistic to expect attitudes to change as the result of a one-off workshop.

“Training is not enough... For instance, physical violence – in our context, beating a child is normal....we also have to change perceptions, beliefs, culturalisation which takes time.” Tanzanian NGO

“There are a lot of trainers and facilitators out there that haven't got a clue... you can't just refer back to a training toolkit to say, “This is what you've got to do.” Policy Maker

“We focus on them, their personal experiences and their personal perspective on things. Revealing for them personally how they treat children, how they view children and how they're working with girls” International NGO

In order to maximise effectiveness, greater consideration needs to be given to the format and facilitation of training, rather than simply focussing on the content:

- Training should be participatory and encourage discussion around values and beliefs, with the opportunity to explore any disconnect between the organisation's safeguarding requirements and the realities of everyday practice.
- It is important to 'humanise' the content by providing examples and drawing connections between the theory and the worker's own experiences.
- Using scenarios can help workers think through the practical steps involved in responding to abuse. Ideally, scenarios should be based on real-life examples as this helps workers to recognise that harm and abuse could happen in their organisation.

“Use case studies. if they are based on real-life cases...the more relevant they are to their situations, the more people identify with them and think, ‘That could happen here, how would I deal with that?’” Policy Maker

- In order to generate open, honest discussion, training should be delivered by what respondents termed 'an insider'. This could be someone within the organisation or someone with a deep understanding of the country context or considerable experience in work related to the vision and mission.

Practice-Based Learning

Despite the strong support for training, this study suggests that learning should be an on-going process rather than simply limited to one off training sessions. There are number of reasons why this is important:

- While workers may accept definitions of abuse and agree to comply with the required procedures, they may not put this into practice if it conflicts with their underlying beliefs and values.
- The way abuse presents can be nuanced and is subject to change so workers' understanding is likely to be deepened through combining theory with practical experience.
- The lack of funding for safeguarding means that smaller NGOs may not be able to afford external training and often lack sufficient expertise to provide it in-house. Building opportunities for on-going, practice-based learning is likely to be more realistic.

This study identified a number of ways in which practice-based learning can be integrated into the work of NGOs:

- On-going dialogue about safeguarding in team meetings and other group discussions.
- Ensuring workers have space to discuss and reflect on their experiences of keeping children safe, either within supervision or while delivering the work.
- Creating space to discuss and reflect on actual cases to allow very targeted, context-specific learning to be achieved.

“you may have read about emotional abuse, psychological abuse – but when you come back to the community, you move from the theoretical and then you're going to the practical.” Tanzanian NGO

Respondents recognised that smaller organisations, or those with less focus on children, may have less exposure to safeguarding issues and limited opportunities for practice-based learning and reflection. Peer learning opportunities, or the creation of communities of practice, are important to allow smaller organisations to learn from the experiences of others. Respondents also identified problems in maintaining these spaces and stressed the importance of investment from donors so that peer-learning forums are properly facilitated and the costs for participants are covered.

Values Based Recruitment

Even where training and practice-based learning are in place, underlying values, beliefs and cultural norms can continue to be a significant challenge. In particular, workers may not identify or respond to abuse where certain forms of harm are commonplace or considered acceptable in that context. For example, in Tanzania there was concern that workers would fail to identify physical violence as this is widely regarded as an acceptable form of discipline and to many, it is just considered normal.

“What's in the community is within the organisation. We have to realise that the organisations are peopled by humans. We have the same issues as the ones that are outside.” International NGO

Changing negative or harmful attitudes towards children takes time and where they exist, training and other forms of learning can have limited impact. Consequently, respondents highlighted the importance of:

- Ensuring workers have the right attitudes and beliefs at recruitment stage rather than simply focusing on training.
- Clearly articulating the values of the organisation and ensuring that workers' personal beliefs are aligned to them.

“If a person doesn't understand how you are working and who you are working with, and they don't have the passion and the right attitude, they will have challenges. We have to change our approach of recruiting people.” Tanzanian NGO

- Prompting workers to reflect on how they put their values into practice and monitoring this through continued observations and supervision.
- Although international standards contain guidance on safer recruitment practices, there is almost no mention of values and beliefs as an important factor to consider when recruiting or supervising staff. Yet these underlying beliefs can have a significant impact on the effectiveness of other safeguarding measures and therefore warrant more attention.

FINDING 2: 'THE SYSTEM IS RELATIONAL' AND IMPLEMENTATION DEPENDS ON TRUST AND COLLABORATION

Another barrier which may prevent an effective response to abuse is the lack of provide clear guidance about the actions workers are expected to take. International standards warn that without clear, documented procedures, workers may be confused or anxious and this could prevent them from raising concerns or lead them to act in a way which compromises the safety of the child. This uncertainty may be magnified by gaps in child protection legislation and poor coordination between agencies, which can leave NGOs feeling isolated and unsure how to proceed. In order to address this, donors and international standards repeatedly emphasise the importance of creating documented procedures to guide the reporting and response to abuse, as well as to formalise referrals and collaboration between different agencies.

While my findings support the importance of procedures in providing clarity and consistency, they also suggest that a narrow focus on process is unlikely to be effective. While workers may understand what is expected, their ability and willingness to follow procedures depend on the quality of relationships within the NGO and with external agencies. The standards pay little attention to this relational component, yet I found that fostering relationships of trust and building opportunities for collaboration is likely to have a significant impact on outcomes.

Reporting Procedures

One of the most consistent recommendations within safeguarding standards and requirements is that NGOs must have a documented procedure for reporting abuse. This step-by-step process should specify who the worker should notify, the timescales for action, and what information needs to be documented.

While all Tanzanian and international NGOs included in this study had these procedures in place, some worried that this approach may not translate well into an East African context:

- Frontline workers may not have access to or even consider consulting policy documents when conducting their work in the community.
- Compliance with procedures may not be emphasised as strongly in East Africa where many NGOs, particularly if they are smaller, tend to be

more informal and rely less on policies to guide practice.

““Having the DSO or a Focal Point is really useful because you say, “You have one job. It’s to tell that person, that’s all you have to do.’ That’s a really clear and simple message.”
International NGO

My findings suggest that procedures which simply direct workers to speak to a designated Focal Point may be the most effective. This provides a clear message that is easy to remember and follow. It also helps to reduce anxiety by limiting the expectations on individual workers, which many felt would increase their willingness to report concerns. However, even where this is included in a procedure, inter-personal relationships may still act as a barrier to reporting:

- When reporting allegations against other staff, workers worry about potential negative consequences for themselves and damage to relationships with colleagues. This is particularly true if they perceive any allegiances between the accused and those in senior positions within the NGO.
- Workers worried about the impact on the person accused and their family, particularly if the allegation could result in them losing their job and potentially result in poverty or destitution.
- Workers also worried about reporting abuse in the community as this could lead to backlash from families or powerful individuals. Workers worried that reporting could damage community relations and negatively affect the ability of the NGO to conduct its work.

““It’s more about the power dynamic and whether it plays on fear of risking your job. This is a valid risk for most of my staff, who live away from home and might travel six hours to get home on a weekend to see their family.”
International NGO

In order to overcome these concerns, workers must have confidence in the NGO and the individual they are reporting to before they come forward. Simply naming a designated Focal Point is unlikely to be sufficient and greater attention needs to be paid to inter-personal relationships and the existence of trust.

- Trust is influenced by intersecting identities of gender, race and religion. Consequently, it is important to offer alternative reporting channels that take these factors into account.
- For reporting channels to be effective, NGO workers need to contribute to their creation. In particular, frontline staff, particularly female and national personnel, need to have a much stronger voice in the design of safeguarding procedures.
- Rather than focussing simply on process, the creation of procedures needs to include explicit discussion of power, trust and inter-personal relationships so that these factors are not over-looked.

Response Procedures

Many standards also recommend that NGOs have procedures in place that stipulate what action will be taken in response to reports of abuse. There was considerable scepticism about the effectiveness of these procedures in guiding NGOs' response:

- Response procedures assume that NGOs can refer cases to statutory agencies – but this is often not possible and NGOs are invariably required to provide significant follow-up to ensure the child's safety.

“I’ve always said to people, you can write it down on paper, it’s nice and neat and somebody will come and speak to this person and they’ll speak to that person and this is what happens next. It never happens like that.” Policy Maker

“What do you do in the best interests of a child that is being raped by their father and that person is the head of the community? Honestly, we’ve dodged that issue because it is quite context-specific.” Policy Maker

- It is impossible to provide step-by-step guidance for responding, as each case will be unique and as it is hard to predict what action will be required.
- While NGOs have some control over action against alleged perpetrators who work for them, they have much less influence when abuse occurs in the community. This means that abuse outside the NGO is often more complex, yet policymakers admitted avoiding tackling this in the guidance.
- Although case management guidelines could assist NGOs in responding to abuse, case management is generally viewed as separate from safeguarding and is not even mentioned in most standards and requirements.

“For me, managing a case is like ‘this is a child, they’re at risk. How are we going to manage this?’ Why is ‘case management’ treated different from ‘child protection’? For some reason, they’re seen as separate entities when actually, it’s all part of the same thing.” International NGO

As with reporting procedures, there is an expectation that the designated safeguarding Focal Point plays a key role in guiding or leading any action in response to abuse. However, there was less confidence in the ability of Focal Points to do this effectively:

- The process for selecting a Focal Point can be haphazard, based on availability and the willingness of individuals to assume this additional responsibility. Many Focal Points may lack the knowledge and expertise required to guide the response.
- The lack of funding for safeguarding means that Focal Points often assume safeguarding responsibilities on top of another full-time post. This means they have limited time and capacity to follow up on safeguarding concerns.
- Although the standards highlight the importance of additional training and support for Focal Points, limited resources mean that many NGOs cannot afford external support and managers often lack the specialist skills and knowledge required to provide this in-house.

“Our Child Protection Worker is also a Youth Worker. So, he has to balance being a Youth Worker, and at the same time being a Child Protection Officer - maybe on paper it makes sense, but practically it makes no sense at all.” Tanzanian NGO

Rather than relying on one individual, my study suggests that the best way to decide on the actions that are required is ensuring collaborative dialogue between key members of the team. This allows a broad range of expertise to be accessed, while reducing the pressure on individual staff. It is important to acknowledge that these types of discussions are a common feature of most case management systems and do not represent something new or revolutionary. What is new, however, is the finding that these types of discussions should be emphasised as part of effective safeguarding rather than simply being recommended to organisations engaged in more formal case work.

“When we get stuck or have challenges, we always consult. We do case analysis internally, to get ideas from people...because we all have, different experiences in working with cases so we need those ideas.” Tanzanian NGO

“It’s not going to impress anybody with a social work background, but really, all it is, is people meeting...and they share with the group so that the group is more aware.” International NGO

Inter-Agency Protocols

In addition to internal procedures, most standards recommend that NGOs map local services and develop inter-agency protocols to formalise processes for referral and collaboration. In general, international respondents, including the Global NGO in Tanzania, felt that these formalised procedures were helpful in reducing the isolation of NGOs and ensuring timely collaboration between agencies. However, neither the Local NGO nor the Local CBO undertook any kind of mapping and they did not have formal referral pathways in place. This does not mean that they did not see the value of collaboration with others, but rather, that the context demanded a slightly different approach:

- In Tanzania, the roles and responsibilities of different agencies are defined in law, and NGOs can risk losing their registration if they do not adhere to the required referral pathways. Within this context, the need for separate protocols appeared redundant.
- The risk of insensitive handling of cases, victim blaming and re-traumatisation when engaging with statutory agencies was a real concern. Ensuring a sensitive approach could not be determined by simply creating a procedure but rather, depended on identifying specific individuals within different agencies who had the right knowledge, skills and attitudes to effectively safeguard children.
- The Tanzanian NGOs, including the Global NGO, felt strongly that statutory agencies and other civil society organisations were more likely to respond positively where there was established relationships and collaboration. Simply having the contact details or having a procedure on paper was not enough.

“When you involve local authorities, they apply a ‘sledgehammer to crack a nut’ approach... They very rarely see a child as a victim. They’ll potentially make matters worse. The child will continue to be more traumatic in the way they go about things.” International NGO

“They don’t have a proper way of having a conversation with the victim or the child...you find people from the military who are assigned to these offices and that’s all they know. They don’t have much knowledge of how to deal properly with children.” Tanzanian NGO

Instead of simply mapping services or developing protocols, this study highlights the importance of building network relationships to ensure cooperation when cases are identified. This could be achieved in a number of ways:

- Tanzanian NGOs stressed the importance of involving statutory agencies as early as possible. Although they may offer the NGO limited support, proactive engagement helps build a sense of partnership and improved collaboration over time.
- Peer-to-peer learning forums (see Finding 1), provide an opportunity for organisations to build relationships and collaborate on strategies to overcome common challenges within the local system.
- Both the Global NGO and Local NGO invited statutory agencies to attend their internal training sessions and to accompany staff on their day-to-day activities. This was seen as critical in building relationships and allowed the NGOs to “bring them on board” (Global NGO) and “plant seeds” (Local NGO) aimed at improving their approach to children.

“If the working relationship with them is good, they will also take your issues quite seriously....If they trust you, they will just be able to collaborate with what you are doing and they respect you.” Tanzanian NGO

“Working with them on a regular basis for them to get an understanding of the work, and the vision and mission we have as an organisation. So, they’ve built a level of trust in us so that if we do need to refer someone, we know they will get the proper care that is needed.” Tanzanian NGO

Collaboration with Families

International standards recognise children and their families as active agents in reporting concerns but tend to view them as passive recipients when it comes to the response. There is little reference to involving children and families in decision-making which is problematic for a number of reasons:

- There has been a shift within the sector towards a ‘survivor-centred’ approach in which survivors’

views and preferences inform and shape the response. Without an explicit need to engage children and families in determining the response, there is a real risk that the survivor voice is lost.

- Families may resist interventions if they feel these could shame or cause conflict within their family and wider community. The ability of the NGO to intervene often depends on working with the child and family to ensure their on-going cooperation.
- In contexts where there are limited services, the family is often the only option for ensuring the long-term safety of the child. It is therefore important to work with the child in the context of their family and strengthen the relationships around the child in order to keep them safe.

“Some fathers can refuse to provide information because they see us as interfering in their lives... We have to insist, provide them with information and offer a process of continual engagement.” Tanzanian NGO

All three NGOs in Tanzania stressed the importance of working with families and actively engaged them in determining the response. The fact that this is not clearly articulated in safeguarding requirements created a number of challenges:

- Engaging families requires additional time and resources and this is not recognised in the funding provided for safeguarding.
- NGOs worried that donors did not understand the importance of collaboration with families and may require an individualistic response to cases of abuse which focusses on the child but ultimately damages the relationships closest to them.

“There’s no additional resources but we have to find a way... Maybe because of their [the donor’s] standpoint, they think we were just looking at a child protection case but we are also working with the family.” Tanzanian NGO

Rather than focussing on the child in isolation, these findings suggest that any response must consider the child in the context of their family and wider community. Again, collaboration with families is a key element of case management practice and is another reason why positive practices from case management should be integrated into guidance on safeguarding.

FINDING 3: 'ACCOUNTABILITY IS MUTUAL' AND REQUIRES SENIOR LEADERS AND DONORS TO LEAD BY EXAMPLE

The need for accountability emerged strongly from the review of international standards and donor requirements. NGOs are expected to implement measures to promote internal accountability for safeguarding via oversight from managers, senior leadership and the Board. This is complemented by external accountability to donors, through safeguarding requirements prior to obtaining funding and the reporting of safeguarding incidents so that donors can monitor the NGO's response.

Although there was general consensus that accountability is important, a top-down, punitive approach is unlikely to be effective. Instead there needs to be mutual accountability for ensuing safeguarding, with senior leadership and donors providing the resources and proactive support workers need in order to respond effectively to cases of abuse.

Accountability to Senior Leadership

International standards and donor requirements recommend a variety of measures to ensure internal accountability for safeguarding. In addition to signing off procedures, managers must ensure workers fulfil their responsibilities and non-compliance should be linked with disciplinary procedures. Over recent years, there has been an increasing emphasis on the role of the Board in holding the executives within the NGO accountable for the implementation of safeguarding measures and ensuring a robust response to safeguarding concerns.

International respondents, including the Global NGO, emphasised the importance of senior managers and the Board in enforcing safeguarding throughout the organisation. In contrast, the national NGOs in Tanzania were sceptical about the role of NGO boards in providing oversight. They warned that:

- Boards in many Tanzanian NGOs have a very limited, administrative role and many would be unable or unwilling to take on more extensive responsibilities.
- Even if there were appetite to assume responsibility for safeguarding, it is such a new concept that Board members are unlikely to have sufficient knowledge or understanding to provide meaningful oversight or support.

- There are often inter-personal or familial relationships between the Director and the Board, undermining their ability to provide oversight and accountability.

“The problem is that they don't have a reliable Board that oversees their work. That sits with the Director only. The Board are mainly there just as a formality... Also, in the majority of the Boards, the Chairperson is a relative of the Director.” Tanzanian NGO

“Boards of small NGOs which are local and not international, they're a Board for the sake of officialising documents and officialising policies. Not to support how you actually make sense of the policy.” Tanzanian NGO

While the Local NGO and Local CBO in Tanzania both felt that accountability to Boards might be effective in international agencies with functioning governance structures, they had very little hope that this could be achieved in smaller, local organisations.

There was more consensus around the role of managerial accountability, although some differences were still evident. International respondents and the Global NGO tended to emphasise the need for non-negotiable reporting requirements, with clear consequences for workers if these were not adhered to. In contrast, the Local NGO and Local CBO both felt that emphasising punitive policy compliance removed the “humanity” (Local NGO) and could exacerbate workers' fear about coming forward with concerns.

Rather than just enforcing compliance, there was considerable consensus around the importance of managers role modelling expected behaviours and leading by example. There are many different ways in which managers can do this:

- Tanzanian NGOs stressed the importance of managers working alongside staff, engaging with children, and demonstrating their commitment to keeping people safe.

“That’s where the issue of culture comes in – me as a leader doing what I’m supposed to be doing in terms of protecting children... Training is not enough, but the way you live, the way you behave, the way you conduct yourself.” Tanzanian NGO

- Managers can demonstrate the importance of safeguarding at a very practical level by ensuring staff have the time and resources they need to implement safeguarding and follow up concerns.
- Managers were not expected to lead the response to cases but their participation in case discussions is critical in shouldering some of the burden and providing support to safeguarding staff.
- Managers can help facilitate an effective response from other agencies as requests for support from them are likely to be taken more seriously, particularly in counties like Tanzania where organisations tend to be quite hierarchical.

Although the managers in Tanzania recognised the importance of providing active support to staff who were responding to safeguarding concerns, they found it difficult to prioritise this given the other demands on their time. They also recognised gaps in their knowledge and felt they could benefit from additional training in this area. At present, international standards emphasise the need for additional training and support for Safeguarding Focal Points but the needs of managers are entirely overlooked. Building the capacity of managers would not only help them feel more equipped to respond to safeguarding issues but would also enable them to lead by example and provide greater practical and emotional support to their teams.

“I think being in senior management, our mind is fixed on leadership and you tend to lose the emotion and the humane part. I think training is needed to help balance it.” Tanzanian NGO

Donor Accountability

Safeguarding requirements also create external accountability to donors. This appears to function in two distinct ways. Firstly, the imposition of safeguarding requirements acts as an incentive to NGOs as they must put safeguarding measures in place, including reporting and response procedures, before they can obtain funding. Secondly, once funding is in place, NGOs are often required to inform donors of safeguarding allegations, which acts as a deterrent, as failure to respond appropriately can result in the withdrawal of funding.

“I’ve seen more action on safeguarding since donors have asked for it to be in place than I ever saw before. The push comes with money, that’s the reality. That is a positive impact.” Policy Maker

Overall, there was consensus that donor requirements were an effective incentive and helped ensure NGOs had safeguarding measures in place. However, there were some concerns about how these requirements were implemented:

- Both Tanzanian and international NGOs were sceptical about the ability of donors to assess the adequacy of NGO safeguarding measures when many do not train their own staff on safeguarding or have staff with any expertise in this area.
- Tanzanian NGOs were very concerned that donors had little understanding of their context or the challenges they face when responding to abuse.
- Some donors simply have a checklist of requirements which apply to all NGOs irrespective of size, location or operating context. This approach can leave NGOs feeling compelled to implement measures that are not appropriate or are unrealistic in their context.
- There was frustration and resentment that donors require safeguarding measures to be in place but often refuse to let NGOs include the associated costs in their project budgets.

“These are families, they’re not pieces of paper? If it’s just a matter of looking at what’s documented, you will never understand why we say we need more funds for something.” Tanzanian NGO

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There were even greater concerns about the need to report safeguarding concerns to donors. Some respondents felt there was some value in reporting to donors as this gave them information about how the NGO implemented safeguarding measures in practice, rather than simply relying on what was documented in policies. This potential benefit, however, was overshadowed by the risk of funding being withdrawn:

“I think the initial gut feeling as an organisation, when a child protection issue is raised is, ‘Have we been compliant?’ That’s depressing. Actually, what should be our first thought is ‘Have we protected the child?’”
International NGO

- NGOs may avoid informing donors about cases due to the fear of funding being withdrawn. If funders are unaware of cases, they are unable to hold NGOs to account for their response.
- Fears about losing funding may mean that the child’s needs become secondary to the requirements of the donor, as the NGO is focused on maintaining their funding.
- NGOs may feel compelled to follow donor instructions but the donors’ lack of knowledge and expertise can mean that their suggestions actually put the child at greater risk.
- Tanzanian workers had little confidence that international donors would understand the importance of working holistically with families and feared they would impose individualistic responses that would damage the relationships closest to the child.

“If we’re breaking the bond between the mother and the child, or between the mother and her husband...you have already disrupted everything. From the donor’s perspective, ‘yay, the child is safe’, but from our perspective the child is safe but you have ruined the family.” Tanzanian NGO

“Running in and saying to people ‘You’ve got to be reporting on all of this’, and ‘This is how you do it’, it’s just nonsense and it’s going to cause more damage than good” Policy Maker

There was a sense that donors could play an important role if they were themselves more accountable for safeguarding, rather than placing all the responsibility on the NGOs they fund. Potential change include:

- To ensure trust and credibility, donors need to develop their own safeguarding procedures and provide training to their staff before requiring this of others.
- Ideally, donors should employ staff in the regions where they are funding so staff have a better understanding of the context. Where this is not possible, donors should visit more frequently so they have a more realistic understanding of the opportunities and challenges NGOs face.
- Rather than simply imposing requirements, donors should engage in constructive dialogue with NGOs to understand the multiple and competing risks that NGOs are trying to manage.
- The most powerful and consistent message to donors was that if they are serious about improving the response to abuse, then they must allow NGOs to include safeguarding within their budget.
- In providing funding, donors need to recognise that NGOs receive many reports of abuse in the community which they cannot simply refer on to other agencies. Funding for safeguarding must reflect this.
- NGOs’ ability to respond effectively to cases is often limited by weaknesses in the child protection system. Donors can have a positive impact by investing in child protection system strengthening.

“Many of these things cannot be done without financial support. Financial support is necessary to safeguard the child.”
Tanzanian NGO

Appendix A: International standards, donor requirements, guidance and policy commitments considered in Stage 1 of this study

Bond (2018) UK Non-Governmental Organisations: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector.

Bond (2019) 20 core elements: a toolkit to strengthen safeguarding report-handling.

Child Protection Working Group (2012) Minimum Standards for Child Protection in Humanitarian Action.

Child Protection Working Group (2014) Inter agency guidelines for case management and child protection.

CHS Alliance (2014) Core Humanitarian Standard on Quality and Accountability.

CHS Alliance (2015) CHS Guidance Notes and Indicators.

CHS Alliance (2017) PSEA Implementation Quick Reference Handbook.

Development Assistance Committee (2018) DAC Recommendation on ending sexual exploitation, abuse, and harassment in development co-operation and humanitarian assistance.

Department for Foreign Affairs and Trade (2017) DFAT Child Protection Policy.

Department for International Development (2019) Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector.

Department for International Development (2018) Guidance: Enhanced Due Diligence Safeguarding for External Partners.

Human Dignity Foundation (2018) Child Safeguarding Policy.

Humanitarian Accountability Partnership International (2003) HAP-I Accountability Principles.

Humanitarian Accountability Partnership International (2007) Standard in Humanitarian Accountability and Quality Management.

Humanitarian Accountability Partnership International (2008) The Guide to the HAP Standard: Humanitarian Accountability and Quality Management.

Inter-Agency Standing Committee (2016) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by own Personnel.

International Safeguarding Children in Sport Working Group (2011) International Safeguards for Children in Sports.

International Safeguarding Children in Sport Working Group (2016) International Safeguards for Children in Sports.

Keeping Children Safe (2011) How to implement the standards.

Keeping Children Safe (2011) Standards for Child Protection.

Keeping Children Safe (2011) Training for Child Protection.

Keeping Children Safe (2014) Child Safeguarding Standards and how to implement them.

Keeping Children Safe (2014) Developing Child Safeguarding Policies and Procedures: A Facilitator's Guide.

Keeping Children Safe (2014) Understanding Child Safeguarding: A Facilitator's Guide.

Oak Foundation (2018) Child Safeguarding & Grant Making: Guidance Notes for Programme Staff.

Oak Foundation (2018) Safeguarding Children, Self-Audit for Grantees.

UK Aid (2014) Child Protection Policy Self Audit Tool.

UK Aid (2014) Working with Children, Keeping them Safe.

UK Aid (2016) Child Protection and Do No Harm Self Audit Tool.

UK Aid (2016b) Do No Harm Policy.

USAID (2015) Standard provisions for U.S. Nongovernmental Organizations: A Mandatory Reference for ADS Chapter 303.

Appendix B: Empirical Literature included in Stage 2 of this study

- Anderson, M.B., Brown, D. and Jean, I. (2012) *Time to Listen: Hearing People on the Receiving End of International Aid*, Cambridge, Massachusetts: CDA Collaborative Learning Projects
- Austin, L. and O'Neil, G. (2013) *The Joint Standards Initiative Global Stakeholder Consultation*. Online.
- Banos-Smith, H. (2009) *The Right to Say and the Duty to Respond: The Impact of Complaints and Response Mechanisms on Humanitarian Action*, Geneva: Humanitarian Accountability Partnership-International. Online.
- Bohm, B. (2017) "She got spoilt": Perceptions of victims of child sexual abuse in Ghana', *Journal of Child Sexual Abuse*, 26(7), pp.818-838
- Candler, T., Gannon, G. and Wachira, J. (2015) 'Child protection in a low-resource setting: Experiences from paediatric professionals in Kenya', *Child Abuse Review*, 25, pp.424-432
- Child, J.C., Naker, D., Horton, J., Walakira, E.J. and Devries, K.M. (2014) 'Responding to abuse: Children's experiences of child protection in a central district, Uganda', *Child Abuse & neglect*, 38, pp.1647-1658
- Cooper, E. (2012) 'Following the law but losing the spirit of protection in Kenya', *Development in Practice*, 22(4), pp.498-509
- Csaky, C. (2008) *No One to Turn To: The under-reporting of child sexual exploitation and abuse by aid workers and peacekeepers*, London: Save the Children. Online.
- Davey, C., Nolan, P. and Ray, P. (2010) *Change Starts With Us, Talk to Us!* Geneva: Humanitarian Accountability Partnership International. Online.
- Department for International Development (DfID) (2018) *Victim and Survivor Voices: Main Findings from a DFID-led Listening Exercise*, London: DfID. Online.
- GCPS Consulting (2013) *KCS Impact Study Report. Internal Keeping Children Safe Report*. Unpublished
- Jewkes, R., Penn-Kekana, L. and Rose-Junius, H. (2005) "If they rape me, I can't blame them": Reflections on gender in the social context of child rape in South Africa and Namibia', *Social Science & medicine*, 61, pp.1809-1820
- Kisanga, F., Mbwambo, J., Hogan, N., Nystrom, L., Emmelin, M. and Lindmark, G. (2010) 'Perceptions of child sexual abuse – a qualitative interview study with representatives of the socio-legal system in urban Tanzania', *Journal of Child Sexual Abuse*, 19(3), pp.290-309
- Kisanga, F., Nystrom, L., Hogan, N. and Emmelin, M. (2011) 'Child Sexual Abuse: Community Concerns in Urban Tanzania', *Journal of Child Sexual Abuse*, 20(2), pp.196-217
- Krueger, A., Thompstone, G. and Crispin, V. (2014) 'Learning from child protection systems mapping and analysis in West Africa: Research and policy implications', *Global Policy*, 5(1), pp.47-55
- Lattu, K. (2008) *To Complain or Not To Complain: Still The Question – Consultations with humanitarian aid beneficiaries on their perceptions of efforts to prevent and respond to sexual exploitation and abuse*, Geneva: Humanitarian Accountability Partnership International.
- McAlpine, K. (2015) *Legislation, responsibilities and procedures for protecting children in Tanzania: What does it mean for people wanting to build safe schools*.
- McAlpine, K. (2016) *Consultations with women, children and civil society in Tanzania: Their experience of violence and recommendations for change*
- Muleya, W. (2006) 'A comparative study of social work intervention in context in Zambia and England', *International Social Work*, 49(4), pp.445-457
- Murove, T., Forbes, B., Kean, S., Wamimbi, R. and Germann, S. (2010) 'A discussion of perceptions of community facilitators from Swaziland, Kenya, Mozambique and Ghana: Cultural practices and child protection', *Vulnerable Children and Youth Studies*, 5(S1), pp.55-62
- Pierce, L. and Bozalek, V. (2004) 'Child abuse in South Africa: an examination of how child abuse and neglect are defined', *Child Abuse & Neglect*, 28, pp.817-832
- Plummer, C. and Njugana, W. (2009) 'Cultural protective and risk factors: Professional perspectives about child sexual abuse in Kenya', *Child Abuse & Neglect*, 33(8), pp.524-532
- Rhind, D and Owusu-Sekyere, F. (2018) *International Safeguards for Children in Sports: Developing and Embedding a Safeguarding Culture*, Abingdon: Routledge

Schiller, U. (2017) 'Child sexual abuse allegations: Challenges faced by social workers in child protection organisations', *Practice: Social Work in Action*, 29(5), pp.347-360

Schmid, J. and Patel, L. (2016) 'The interaction of local and international child welfare agendas: A South African case', *International Social Work*, 59(20), pp.246-255

Spies, G.M., Delpont, C.S.L. and Le Roux, M.P. (2015) 'Developing safety and risk assessment tools and training materials: A researcher-practice dialogue', *Research on Social Work Practice*, 25(6), pp.670-680

UNHCR and Save the Children UK (2002) *Sexual Violence and Exploitation: The Experience of Refugee Children in Liberia, Guinea and Sierra Leone – Report of Assessment Mission Carried Out From 22 October To 30 November 2001*, Geneva: UNHCR and Save the Children UK. Online.

Wessells, M., Lamin, D., Kind, D., Kostelny, K., Stark, L. and Lilley, S. (2012) 'The disconnect between community-based child protection mechanisms and the formal child protection system in rural Sierra Leone: Challenges to building an effective national child protection system', *Vulnerable Children and Youth Studies*, 7(3), 211-227

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